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April 12, 2021

**VIA ECF**

Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

Re: *John Doe v. New York University*; No. 20-cv-01343 (GHW)  
Request for Extension of Time

Dear Judge Woods:

This firm represents Defendant New York University (“Defendant” or “NYU”) in the above-referenced action and writes pursuant to your Honor’s Individual Rules of Practice to request an extension of time to answer the Complaint.

On May 15, 2020, this Court stayed discovery pending briefing and resolution of Defendant’s motion to dismiss (Dkt. 26). On March 31, 2021, this Court granted Defendant’s motion to dismiss, in part, and denied the remainder. (Dkt. 40). Pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), Defendant’s deadline to answer the Complaint is April 14, 2021.

Defendant respectfully requests a two-week extension of time to April 28, 2021. This is Defendant’s first request to extend this deadline and second request for an extension in this case. A Case Management Plan and Schedule Order has not yet been entered in the case.

Defendant requests this extension of time because Defendant has had difficulty accessing relevant documents necessary to fully and accurately respond to the

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allegations in the Complaint due to the COVID-19 pandemic and the fact that NYU's Title IX office was packed up and moved during the pandemic and many files remain in boxes. In addition, many of Defendant's employees continue to operate remotely and have not been able to retrieve the files at issue. As a result, Defendant requires the additional time to secure the requisite permissions to access the files, review them, and finalize its Answer.

Plaintiff consents to the requested extension.

Respectfully submitted,



Jeffrey Metzler

cc: Kimberly C. Lau (via CM/ECF)  
James Figliozi